

CONNER RILEY & FRYLING
attorneys at law

The Bell Telephone Building
17 West Tenth Street
P.O. Box 860
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Phone (814) 453-3343
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July 12, 2005

W. Patrick Delaney, Esquire
100 State Street, Suite 700
Erie, PA 16507

RE: Brown v. Edmond Chevrolet, Inc., et al
U.S. District Court for the
Western District of PA
No. 04-117 Erie

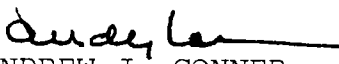
Dear Pat:

Please find enclosed the revised Joint Motion to Extend Discovery. Please note the attached Notice scheduling the depositions of Douglas and Christina Brown for Thursday, August 25, 2005 including a Request for Documents to be used during these depositions.

Please sign the enclosed Motion and return it to me for filing with the Court at your earliest convenience.

Very truly yours,

CONNER RILEY & FRYLING


ANDREW J. CONNER

AJC/clh.

Enclosures.



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17 West Tenth Street
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July 25, 2005

W. Patrick Delaney, Esquire
100 State Street, Suite 700
Erie, PA 16507

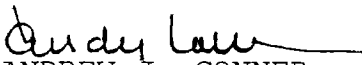
RE: Brown v. Edmond Chevrolet, Inc., et al
U.S. District Court for the
Western District of PA
No. 04-117 Erie

Dear Pat:

Please find enclosed Defendants' Requests for Production
directed to Plaintiff in the above matter.

Very truly yours,

CONNER RILEY & FRYLING


ANDREW J. CONNER

AJC/clh.

Enclosure.

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17 West Tenth Street
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August 2, 2005

W. Patrick Delaney, Esquire
100 State Street, Suite 700
Erie, PA 16507


RE: Brown v. Edmond Chevrolet, Inc., et al
U.S. District Court for the
Western District of PA
No. 04-117 Erie

Dear Pat:

Please find enclosed Defendants' Interrogatories directed to
Plaintiff in the above matter.

Very truly yours,

CONNER RILEY & FRYLING


ANDREW J. CONNER

AJC/clh.

Enclosure.

CONNER RILEY & FRYLING
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August
~~July~~ 12, 2005

W. Patrick Delaney, Esquire
100 State Street, Suite 700
Erie, PA 16507

RE: Brown v. Edmond Chevrolet, Inc., et al
U.S. District Court for the
Western District of PA
No. 04-117 Erie

Dear Pat:

As per my July 12, 2005 letter and our secretaries' recent telephone conversations, please find enclosed another copy of the Notice scheduling the depositions of Douglas and Christina Brown for Thursday, August 25, 2005 in Jamestown regarding the above matter. Again, please note I have included a Request for Documents to be used during these depositions.

Very truly yours,

CONNER RILEY & FRYLING

ANDREW J. CONNER

AJC/clh.

Enclosures.

CONNOR RILEY & FRYLING
attorneys at law

The Bell Telephone Building
17 West Tenth Street
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August 22, 2005

faxed 1:40 & hand delivered

W. Patrick Delaney, Esquire
100 State Street, Suite 700
Erie, PA 16507

RE: Brown v. Edmond Chevrolet, Inc., et al
U.S. District Court for the
Western District of PA
No. 04-117 Erie

Dear Pat:

Per your client's request, I am willing to Mrs. Brown's deposition this Thursday, August 25, 2005 starting at 9:30 a.m. at my office. It is my understanding that Mr. Brown's deposition can probably be rescheduled in early September, 2005, per your request.

In follow-up to my numerous previous requests and most recent telephone request to you, prior to Mrs. Brown's August 25, 2005 deposition, I would like to review the documents the Browns have which are responsive to the outstanding Requests for Documents.

In addition to the documents which have been requested and in lieu of a formal Rule 34 Request for Production, please advise Mrs. Brown to bring the following documents with her on August 25, 2005:

1. Checks or documents the Browns have evidencing any investment they made in Shults Sales and Leasing identifying the dollar amount of that investment and/or identify them investing \$135,000 in Shults Sales and Leasing in 2000 and thereafter;
2. Documents, memorandums and/or diaries they have regarding or relating to any oral conversations they had with Tim Shults, Ed Shults and/or any employees or representatives of Shults Sales and Leasing regarding the sale or surrender of their investment interest in that entity in 2003;

W. Patrick Delaney, Esquire
August 22, 2005
Page 2

3. Their 2000 through 2004 tax returns, including any K-1s and 1099s which were part of or related to those returns;
4. Documents and correspondence prepared or received by the Browns regarding or relating to any loans made to them by relatives or others which were used by the Browns as a source of their investment in Shults Sales and Leasing, and documents and correspondence relating to the repayment of those loans in 2003 or thereafter; and
5. Any other documents which have been previously requested but not yet produced.

If you have any questions regarding the requested documents, please call.

Very truly yours,

CONNER RILEY & FRYLING


ANDREW J. CONNER

AJC/clh.